

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF OHIO  
WESTERN DIVISION**

**Melisa Jenkins.** :  
Plaintiff, : Case No. 1:25-cv-449  
v. : Judge: Jeffrey P. Hopkins  
**Rajib Garu, et al.** : Magistrate Judge: Stephanie K. Bowman  
Defendants. :

**Declaration of Anthony D. Maiorano**

I, Anthony D. Maiorano, hereby declare under penalty of perjury that the foregoing is true and correct (pursuant to 28 U.S.C. § 1746):

1. I am an individual over the age of eighteen and the attorney for the Defendants in the above captioned action.
2. On July 19, 2025, real estate agent Mitchell Kenney, with Keller Williams reached out to me, concerning the property situated on 4457 Mellwood Ave. Cincinnati, OH 45232 (the Mellwood property).
3. Mr. Kenney indicated that he represented potential buyers and that a purchase agreement was anticipated in the near future between his clients and the owner, Plaintiff, Melisa Jenkins.
4. Mr. Kenney reached out to inform me, as attorney for Idealogiz Group, LLC that the purchase price should be in excess of the liens on the Mellwood property.
5. On August 7, 2025, in the morning, Mr. Kenney again reached out to me concerning the Mellwood property.

6. On August 7, 2025, Mr. Kenney requested that Idealogiz Group, LLC lower the “payoff amount,” because “Right now, the Seller [Jenkins] is not agreeing.”

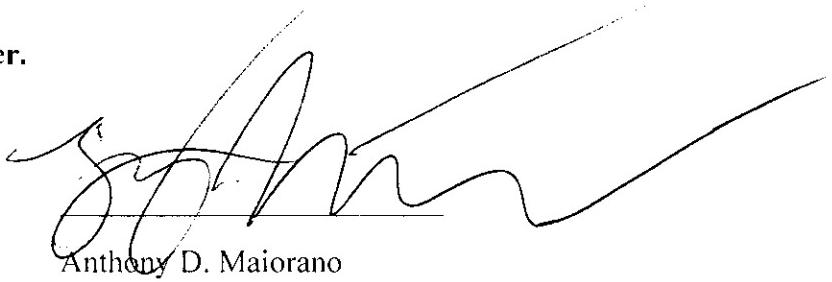
7. I took Mr. Kenney’s request to lower the payoff amount as a negotiation to release the payoff amount of the lien of Idealogiz Group on the Mellwood property, merely because Melisa Jenkins does not like the amount she owes.

8. In the afternoon, on August 7, 2025, John Phillips reached out informing me that he had to withdraw from representation and that he was moving for an extension of time to respond to the motion to dismiss that was filed on July 3, 2025 and has a current date to respond of August 14, 2025.

9. I informed John Phillips that my client is opposing in further extensions of the deadline to respond to the motion to dismiss.

10. Based on Mr. Kenney’s email in the morning of August 7, 2025 and the notification that Mr. Phillips was discharged as counsel for Plaintiff, it was clear that Plaintiff was trying gain leverage in negotiations for the sale of the Mellwood property by delaying the deadline to respond to the motion to dismiss.

**Declarant states nothing further.**



Anthony D. Maiorano

Executed on:  
8/8/2025